

Kami E. Quinn  
Gilbert LLP  
1100 New York Avenue, NW  
7th Floor  
Washington, DC 20005  
Tele: 202.772.2200  
Fax: 202.772.3333  
Email: quinnk@gotofirm.com

*Co-Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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*In re:*

PURDUE PHARMA L.P., *et al.*,

Debtors.<sup>1</sup>

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Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**FOURTH MONTHLY FEE STATEMENT OF GILBERT LLP, FOR ALLOWANCE OF  
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF  
EXPENSES INCURRED AS CO-COUNSEL TO THE AD HOC COMMITTEE OF  
GOVERNMENTAL AND OTHER CONTINGENT LITIGATION CLAIMANTS  
FOR THE PERIOD JANUARY 1, 2020 THROUGH JANUARY 31, 2020**

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

<b>Name of Applicant:</b>	<b>Gilbert LLP</b>
<b>Authorized to provide professional services to:</b>	<b>Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants</b>
<b>Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:</b>	<b>December 2, 2019 (Docket #553)</b>
<b>Period for which compensation and reimbursement is sought:</b>	<b>January 1, 2020 through January 31, 2020</b>
<b>Amount of compensation sought as actual, reasonable, and necessary:</b>	<b>\$197,665.60 (80% of \$247,082.00)</b>
<b>Amount of expense reimbursement sought as actual, reasonable and necessary:</b>	<b>\$4,796.22 (100%)</b>
<b>This is a:</b>	<b>Monthly Fee Statement</b>

Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 365 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* entered by this Court on December 2, 2019 [Docket #553] (the “**Reimbursement Order**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket #529] (the “**Procedures Order**”), the law firm of Gilbert LLP (“**Gilbert LLP**”), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “**AHC**”), hereby submits this fourth monthly fee statement (the “**Monthly Fee Statement**”) for legal services rendered and reimbursement for expenses incurred for the period commencing January 1, 2020 through January 31, 2020 (the “**Application Period**”).

**Itemization of Services Rendered and Expenses Incurred**

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Application Period by project category. As reflected on Exhibit A, Gilbert LLP incurred \$247,082.00 in fees during

the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 80% of such fees, totaling \$197,665.60.

2. Annexed hereto as **Exhibit B** is a chart of Gilbert LLP's professionals and paraprofessionals, including title, hourly rate, number of hours billed, and total fees of each attorney and paraprofessional who rendered services to the AHC in connection with these chapter 11 proceedings during the Application Period. The blended hourly rate of the attorneys during the Application Period is \$664.01. The blended hourly rate of paraprofessionals during the Application Period is \$253.64.

3. Annexed hereto as **Exhibit C** is the summary of reasonable and necessary expenses incurred during the Application Period. As reflected on Exhibit C, Gilbert LLP incurred \$4,796.22 in expenses during the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 100% of such expenses, totaling \$4,796.22.

4. Annexed hereto as **Exhibit D** are the time records of Gilbert LLP for the Application Period, organized by project category with a daily log detailing the time spent by each professional and an itemization of expenses.

5. Pursuant to the Reimbursement Order, Gilbert LLP has separately recorded services performed relating to allocation of value among the Debtors' creditors, and to the best of Gilbert LLP's knowledge, has not included time relating to intercreditor allocation in this Monthly Fee Statement.

#### **FILING AND SERVICE**

6. This Monthly Fee Statement will be filed and served in accordance with the directives in the Procedures Order.

7. Pursuant to the Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Monthly Fee Statement, serve via email, to the Notice Parties (as defined in the Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue.

8. If an objection is timely served pursuant to the Procedures Order, the Debtors shall be authorized and directed to pay Gilbert LLP the amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue. It shall not be sufficient to simply object to all fees and expenses.

WHEREFORE, Gilbert LLP respectfully requests compensation in the amount of \$197,665.60 (80% of \$247,082.00) and reimbursement of reasonable and necessary expenses incurred in the amount of \$4,796.22 (100%), for a total amount of \$202,461.82, for the Application Period.

Dated: March 12, 2020  
Washington, DC

Respectfully submitted,

**GILBERT LLP**

/s/ Kami E. Quinn

Kami E. Quinn  
1100 New York Avenue, NW  
7th Floor  
Washington, DC 20005  
Tele: 202.772.2200  
Fax: 202.772.3333  
Email: [quinnk@gotofirm.com](mailto:quinnk@gotofirm.com)

*Counsel for the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants.*

**Exhibit A**

**Summary of Services by Category**

**SUMMARY OF SERVICES BY PROJECT CATEGORIES**

<b>Project Code</b>	<b>Project Category</b>	<b>Hours Billed in Period</b>	<b>Fees for Period</b>
A001	Asset Analysis & Recovery	223.6	\$117,245.50
A003	Business Operations	3.2	\$2,880.00
A004	Case Administration	4.1	\$2,085.00
A006	Employment / Fee Applications	2.3	\$632.50
A007	Emergency Relief Fund	8.1	\$9,515.00
A008	Litigation: Contested Matters / Adversary Proceedings / Automatic Stay	77.7	\$51,646.50
A009	Meetings / Communications with AHC & Creditors	29.1	\$33,070.00
A015	Non-Working Travel Time (Billed @ 50%)	26.5	\$15,612.50
A019	Plan of Reorganization / Disclosure Statement	11.1	\$14,395.00
		<b>385.7</b>	<b>\$247,082.00</b>

**Exhibit B**

**Summary of Compensation by Professional**

**SUMMARY OF COMPENSATION BY PROFESSIONAL**

<b>Name of Professional</b>	<b>Position / Year Admitted to Practice</b>	<b>Hourly Billing Rate</b>	<b>Hours Billed for Period</b>	<b>Total Fees for Period</b>
Scott D. Gilbert	Partner / District of Columbia - 1979 U.S. Court of Appeals for the District of Columbia – 1980 U.S. Court of International Trade - 1984 U.S. Supreme Court - 1987 U.S. District Court for the District of Columbia – 2008 Cherokee Nation - 2017 U.S. Court of Federal Claims - 2019	\$1,500.00 \$750.00	35.1 11.0	\$52,650.00
Craig J. Litherland	Partner / State of Texas – 1983 Supreme Court of Texas – 1983 U.S. Court of Appeals Fifth Circuit – 1984 U.S. District Court for the Southern District of Texas – 1985 U.S. Federal Court for the Eastern District of Michigan – 1995 District of Columbia - 2001 U.S. District Court for the Western District of Texas – 2008	\$1,250.00	0.4	\$500.00
Kami E. Quinn	Partner / Commonwealth of Virginia – 2000 District of Columbia – 2006 U.S. Court of Appeals for the Third Circuit – 2009	\$950.00 \$475.00	45.3 15.5	\$43,035.00 \$7,362.00
Jenna Hudson	Partner / State of Maryland – 2010 State of Massachusetts – 2010 District of Columbia - 2011 U.S. District Court for the District of Maryland – 2011 U.S. Court of Appeals for the First Circuit – 2015 U.S. Supreme Court - 2016 Cherokee Nation – 2017 U.S. District Court for the District of Columbia - 2019	\$675.00	51.8	\$34,965.00
Monique Abrishami	Of Counsel / State of Florida – 2009 District of Columbia - 2019	\$640.00	39.6	\$25,344.00
Mike Rush	Of Counsel / State of Delaware – 2007 District of Columbia 2017	\$640.00	24.5	\$15,680.00
Emily Grim	Associate / Commonwealth of Pennsylvania – 2010 State of Illinois – 2010 District of Columbia – 2012 U.S. District Court for the District of Columbia - 2016 U.S. Court of Federal Claims – 2020	\$600.00	1.1	\$660.00
Daniel Wolf	Associate / State of New York – 2011 District of Columbia – 2013 Southern District of New York – 2011 U.S. Court of Appeals for the Ninth Circuit – 2012	\$600.00	3.4	\$2,040.00
Adam Farra	Associate / State of Maryland – 2011 District of Columbia – 2015 U.S. Court of Appeals for the Second Circuit – 2017	\$570.00	12.6	\$7,182.00



<b>Name of Professional</b>	<b>Position / Year Admitted to Practice</b>	<b>Hourly Billing Rate</b>	<b>Hours Billed for Period</b>	<b>Total Fees for Period</b>
Benjamin Massarsky	Associate / State of New York – 2011 District of Columbia – 2012 U.S. District Court for the District of Columbia – 2012 State of Maryland - 2016	\$500.00	36.0	\$18,000.00
Jasmine Chalashtori	Associate / Commonwealth of Virginia – 2016 State of Maryland – 2017 District of Columbia - 2017	\$380.00	2.4	\$912.00
Rachael Lyle	Staff Attorney / State of Alabama – 2017 District of Columbia - 2018	\$305.00	18.1	\$5,520.50
Tarsha Jones	Staff Attorney / State of Maryland – 2001 District of Columbia - 2006	\$290.00	66.9	\$19,401.00
Christian Carey	Law Clerk – Joined firm in 2019	\$325.00	3.3	\$1,072.50
Kelly Saunders	Paralegal – Joined firm in 2018	\$275.00	3.7	\$1,017.50
Alyssa Bonesteel	Paralegal – Joined firm in 2018	\$225.00	1.2	\$270.00
Katherine Johnson	Paralegal – Joined firm in 2018	\$225.00	11.5	\$2,587.50
Peggy Holland	Litigation Specialist – Joined firm in 2002	\$275.00	2.3	\$632.50
	<b>Totals</b>		<b>385.7</b>	<b>\$247,082.00</b>
	<b>Attorney Blended Rate</b>	<b>\$664.01</b>		
	<b>Paraprofessional Blended Rate</b>	<b>\$253.64</b>		

**Exhibit C**

**Summary of Expenses Incurred**

**SUMMARY OF EXPENSES INCURRED**

<b>DESCRIPTION</b>	<b>Total Expenses for Period</b>
Contracted Professional Fees – Litigation Support Vendor	\$682.11
Lexis	\$211.49
Pacer	\$105.00
Westlaw	\$1,880.94
Travel – Airfare (Coach Fare)	\$776.81
Travel – Lodging (Standard Room Rate)	\$368.29
Travel – Meals	\$42.81
Travel – Taxi Fare	\$98.77
Travel – Train Fare (Coach Fare)	\$630.00
	<b>\$4,796.22</b>

**Exhibit D**

**Time and Expense Detail**



1100 New York Avenue, NW  
Suite 700  
Washington, DC 20005  
O 202.772.2200  
F 202.772.3333  
[GilbertLegal.com](http://GilbertLegal.com)

Ad Hoc Committee  
c/o Marshall S. Huebner  
Davis Polk & Wardwell LLP  
450 Lexington Avenue  
New York, NY 10017

March 12, 2020  
Invoice Number: 11319228  
Client Number: 1599

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**FOR PROFESSIONAL SERVICES RENDERED through February 29, 2020**

**Re: Ad Hoc Committee (Purdue)**

<b>Matter Description</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
Purdue Bankruptcy	247,082.00	4,796.22	251,878.22
<b>Total</b>	<b>247,082.00</b>	<b>4,796.22</b>	<b>251,878.22</b>

TOTAL FEES \$ 247,082.00

TOTAL EXPENSES \$ 4,796.22

**TOTAL FEES AND EXPENSES \$ 251,878.22**

**FOR PROFESSIONAL SERVICES RENDERED through February 29, 2020**

**Purdue Bankruptcy**

**A001: Asset Analysis & Recovery**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Massarsky, B.	1/02/20	Analyze complaints against Purdue employees and directors re potential D&O coverage.	3.10	1,550.00
Wolf, D.	1/03/20	Review potential D&O coverage.	.20	120.00
Massarsky, B.	1/03/20	Continue analyzing complaints against Purdue employees and directors.	4.70	2,350.00
Hudson, J.	1/06/20	Confer with D. Wolf re analysis of D&O coverage.	.30	202.50
Hudson, J.	1/06/20	Update summary of insurance analysis in preparation for meeting with UCC.	1.20	810.00
Wolf, D.	1/06/20	Review potential D&O coverage; confer with J. Hudson re same.	2.60	1,560.00
Massarsky, B.	1/06/20	Draft summary of claims in complaints against Purdue directors.	1.40	700.00
Massarsky, B.	1/06/20	Confer with J. Hudson re analysis of CGL provisions.	.40	200.00
Massarsky, B.	1/06/20	Analyze CGL and D&O coverage charts; revise same.	1.40	700.00
Farra, A.	1/06/20	Meet with J. Hudson re Purdue director and officer insurance; correspond with J. Hudson re same.	1.00	570.00
Gilbert, S.	1/07/20	Confer with S. Birnbaum re case strategy.	.50	750.00
Hudson, J.	1/07/20	Finalize high-level summary of insurance asset for strategic planning and meeting with UCC.	7.20	4,860.00
Wolf, D.	1/07/20	Review potential D&O coverage.	.20	120.00
Massarsky, B.	1/07/20	Continue analyzing CGL and D&O coverage charts; revise same.	2.80	1,400.00
Massarsky, B.	1/07/20	Review correspondence re Navigators Rhodes policy.	.70	350.00
Johnson, K.	1/07/20	Research correspondence between Rhodes and Navigators Insurance.	1.40	315.00
Carey, C.	1/07/20	Research potential insurance claim.	.70	227.50
Carey, C.	1/07/20	Communicate with J. Hudson re insurance claim research.	.30	97.50
Gilbert, S.	1/08/20	Confer with UCC re insurance issues.	1.00	1,500.00
Hudson, J.	1/08/20	Revise coverage charts; communicate with S. Gilbert and AHC re same.	.40	270.00

Invoice Number: 11319228  
March 12, 2020

Name	Date	Services	Hours	Amount
Hudson, J.	1/08/20	Analyze how to access collateral against insurance asset based on existing agreements.	.30	202.50
Hudson, J.	1/08/20	Prepare for and participate in call with UCC re insurance-related assets of Purdue.	1.50	1,012.50
Hudson, J.	1/08/20	Confer with M. Abrishami re options for accessing collateral against insurance policies.	.30	202.50
Hudson, J.	1/08/20	Analyze next steps for insurance analysis.	.10	67.50
Abrishami, M.	1/08/20	Confer with J. Hudson re collateral recovery analysis.	.30	192.00
Gilbert, S.	1/09/20	Confer with D. Molton re strategy.	1.50	2,250.00
Hudson, J.	1/09/20	Communicate with M. Abrishami re treatment of collateral under existing agreements and potential for recovery into trust.	.30	202.50
Hudson, J.	1/09/20	Develop strategy for insurance recovery analysis.	.60	405.00
Abrishami, M.	1/09/20	Analyze collateral agreements associated with insurance policies; draft summary.	2.40	1,536.00
Gilbert, S.	1/10/20	Confer with Houlihan Lokey re strategy re insurance issues.	1.00	1,500.00
Hudson, J.	1/10/20	Communicate with S. Gilbert re strategy for insurance recovery analysis.	.20	135.00
Hudson, J.	1/10/20	Flesh out strategy for insurance recovery analysis.	.20	135.00
Hudson, J.	1/10/20	Review analysis of collateral funds to determine process for accessing asset.	.10	67.50
Abrishami, M.	1/10/20	Continue analyzing collateral agreements associated with insurance policies; draft summary.	6.60	4,224.00
Abrishami, M.	1/10/20	Communicate with C. Litherland re results of collateral agreement analysis and strategy for next steps.	.30	192.00
Hudson, J.	1/11/20	Confer with M. Abrishami re analyzing distinctions in certain policies.	.20	135.00
Abrishami, M.	1/11/20	Confer with J. Hudson re scope of project to identify and evaluate distinctions in certain policies.	.30	192.00
Abrishami, M.	1/11/20	Identify and evaluate distinctions in certain policies.	3.00	1,920.00
Abrishami, M.	1/12/20	Continue identifying and evaluating distinctions in certain policies.	.60	384.00
Hudson, J.	1/13/20	Communicate with team re analysis of insolvency guidelines for potential recovery by estate.	.30	202.50
Hudson, J.	1/13/20	Communicate with team re analysis of certain policy provisions.	.30	202.50
Hudson, J.	1/13/20	Communicate with D. Windscheffel (UCC) re potential coverage under certain policies.	.20	135.00

Invoice Number: 11319228  
March 12, 2020

Name	Date	Services	Hours	Amount
Hudson, J.	1/13/20	Confer with B. Massarsky re analyzing express notice provided by Debtors to formulate insurance strategy.	.20	135.00
Hudson, J.	1/13/20	Review M. Abrishami's initial findings on policy language certain policies.	.40	270.00
Grim, E.	1/13/20	Confer with M. Abrishami re policy issues.	.20	120.00
Rush, M.	1/13/20	Research issues re fronting policies and reviewing policies.	6.00	3,840.00
Massarsky, B.	1/13/20	Confer with J. Hudson re notice provided by Purdue to its insurers for different policy types.	.20	100.00
Abrishami, M.	1/13/20	Confer with J. Hudson re asset recovery from collateral agreements and certain policies.	.30	192.00
Abrishami, M.	1/13/20	Analyze revised schedules for program agreement.	.40	256.00
Abrishami, M.	1/13/20	Confer with J. Hudson re analysis of certain policies.	.30	192.00
Abrishami, M.	1/13/20	Identify and evaluate distinctions in certain insurance policies.	1.20	768.00
Lyle, R.	1/13/20	Confer with J. Hudson re extent to which claims potentially trigger policies and related issues.	.20	61.00
Lyle, R.	1/13/20	Research insolvent insurer issue.	5.30	1,616.50
Carey, C.	1/13/20	Communicate with R. Lyle re insolvent insurer research issues and subsequent steps.	.20	65.00
Litherland, C.	1/14/20	Confer with M. Abrishami and J. Hudson re collateral related to insurance policies.	.40	500.00
Hudson, J.	1/14/20	Review and direct continuation of analysis of collateral as a potential asset.	.80	540.00
Hudson, J.	1/14/20	Review and direct continuation of analysis potential insolvent insurer claim.	.50	337.50
Hudson, J.	1/14/20	Review and direct continuation of analysis of distinctions in certain policies.	.40	270.00
Grim, E.	1/14/20	Confer with M. Rush and M. Abrishami re issues re fronting policies.	.20	120.00
Rush, M.	1/14/20	Research issues re fronting policies; analyze policies at issue.	5.10	3,264.00
Rush, M.	1/14/20	Confer with team re policy issues.	.20	128.00
Abrishami, M.	1/14/20	Analyze revised schedules for program agreement; draft summary of same.	.30	192.00
Abrishami, M.	1/14/20	Confer with J. Hudson re distinctions in certain policies.	.40	256.00
Abrishami, M.	1/14/20	Confer with C. Litherland and J. Hudson re strategy related to recovery of collateral into estate.	.80	512.00



Invoice Number: 11319228  
March 12, 2020

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Abrishami, M.	1/14/20	Confer with M. Rush and E. Grim re fronting policies.	.20	128.00
Abrishami, M.	1/14/20	Continue to identify and evaluate distinctions in certain policies.	6.00	3,840.00
Lyle, R.	1/14/20	Confer with J. Hudson re insolvent research.	.50	152.50
Lyle, R.	1/14/20	Continue researching insolvent insurer issue.	1.70	518.50
Carey, C.	1/14/20	Analyze R. Lyle's research summary re insolvent insurer and next steps.	.20	65.00
Gilbert, S.	1/15/20	Participate in meeting re Sackler asset presentation.	4.20	6,300.00
Quinn, K.	1/15/20	Participate in meeting re Sackler asset presentation.	4.20	3,990.00
Hudson, J.	1/15/20	Direct research on constructive notice issues.	.10	67.50
Rush, M.	1/15/20	Research issues re fronting policies.	.80	512.00
Rush, M.	1/15/20	Research notice issues.	2.80	1,792.00
Massarsky, B.	1/15/20	Analyze notice provided to insurers.	.40	200.00
Abrishami, M.	1/15/20	Identify and evaluate distinctions in certain policies.	4.90	3,136.00
Hudson, J.	1/16/20	Communicate with team re analysis of arbitration and choice-of-law provisions.	.20	135.00
Hudson, J.	1/16/20	Review analysis of fronting policies for potential resolution.	.20	135.00
Hudson, J.	1/16/20	Begin to review summary of potential issues in certain policies.	.10	67.50
Jones, T.	1/16/20	Meet with J. Hudson re policy review project.	.10	29.00
Rush, M.	1/16/20	Research insurance issues; draft summary of same.	3.50	2,240.00
Massarsky, B.	1/16/20	Analyze notice provided to insurers.	1.10	550.00
Abrishami, M.	1/16/20	Draft strategic plan for obtaining collateral funds for the estate; communicate with J. Hudson re same.	.80	512.00
Hudson, J.	1/17/20	Communications with UCC re potential issues in certain policies.	2.30	1,552.50
Jones, T.	1/17/20	Review policies across programs for arbitration and choice-of-law provisions.	5.00	1,450.00
Rush, M.	1/17/20	Review fronting policies.	2.60	1,664.00
Abrishami, M.	1/17/20	Confer with R. Lyle re analysis of collateral agreements.	.30	192.00
Abrishami, M.	1/17/20	Confer with J. Hudson re terms of certain policies.	.30	192.00
Abrishami, M.	1/17/20	Analyze memorandum re Purdue fronting policies.	.30	192.00
Lyle, R.	1/17/20	Research insolvent insurer distribution scheme policies, applicable state guaranty funds, and next steps in insolvency; draft analysis of research.	3.40	1,037.00

Invoice Number: 11319228  
March 12, 2020

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Lyle, R.	1/17/20	Confer with M. Abrishami re Purdue financial agreements.	.20	61.00
Lyle, R.	1/17/20	Analyze Purdue collateral policy chart and notes of M. Abrishami re financial agreements assessment.	.30	91.50
Carey, C.	1/17/20	Review R. Lyle memorandum re insolvent insurer research re updated claims procedures and next steps re claims assertion.	.40	130.00
Gilbert, S.	1/19/20	Confer with A. Preis re case strategy.	.50	750.00
Hudson, J.	1/21/20	Direct next steps in review of notice correspondence.	.10	67.50
Jones, T.	1/21/20	Review policies across programs for arbitration and choice-of-law provisions.	8.00	2,320.00
Rush, M.	1/21/20	Research notice issues; draft summary of same.	3.50	2,240.00
Massarsky, B.	1/21/20	Analyze notice provided to insurers.	3.10	1,550.00
Lyle, R.	1/21/20	Draft summary of logistical rules for accessing funds related to Purdue financial agreements.	.40	122.00
Lyle, R.	1/21/20	Analyze Purdue financial agreements to create breakdown of steps needed for accessing funds and assess original and current balances for agreements.	5.70	1,738.50
Jones, T.	1/22/20	Review policies across programs for arbitration and choice-of-law provisions.	8.00	2,320.00
Lyle, R.	1/22/20	Communication with M. Abrishami re Purdue collateral agreements numbers and analysis of logistical steps.	.10	30.50
Jones, T.	1/23/20	Review policies across programs for arbitration and choice-of-law provisions.	8.00	2,320.00
Jones, T.	1/24/20	Continue reviewing policies across programs for arbitration and choice-of-law provisions.	8.00	2,320.00
Abrishami, M.	1/24/20	Review memorandum re constructive notice.	.10	64.00
Lyle, R.	1/24/20	Confer with insolvent insurer administrator re claims estimation date.	.20	61.00
Hudson, J.	1/27/20	Coordinate with R. Lyle re strategy for accessing insolvent insurer coverage.	.10	67.50
Hudson, J.	1/27/20	Coordinate with M. Rush re accessing fronting coverage.	.10	67.50
Hudson, J.	1/27/20	Coordinate with M. Rush re extent of notice issues presented by course of conduct with insurers.	.10	67.50
Hudson, J.	1/27/20	Review M. Abrishami's analysis re accessing collateral.	.10	67.50
Jones, T.	1/27/20	Review policies across programs for arbitration and choice-of-law provisions.	8.00	2,320.00

Invoice Number: 11319228  
March 12, 2020

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Massarsky, B.	1/27/20	Continue to analyze notice provided to certain insurers re coverage determination.	1.90	950.00
Hudson, J.	1/28/20	Confer with D. Windscheffel (UCC) re Purdue insurance production and coverage analysis.	.10	67.50
Hudson, J.	1/28/20	Review and outline next steps in insurance analysis.	.10	67.50
Jones, T.	1/28/20	Review policies across programs for arbitration and choice-of-law provisions.	8.00	2,320.00
Massarsky, B.	1/28/20	Analyze notice provided to certain insurers re coverage determination.	3.50	1,750.00
Hudson, J.	1/29/20	Review research on integrated occurrence language in relevant policies.	.40	270.00
Hudson, J.	1/29/20	Review and outline next steps in insurance analysis.	.10	67.50
Massarsky, B.	1/29/20	Continue analyzing notice provided to certain insurers re coverage determination.	1.00	500.00
Massarsky, B.	1/29/20	Confer with J. Hudson and A. Kramer re underwriting files for Purdue.	.50	250.00
Abrishami, M.	1/29/20	Research New York law re certain policies.	1.40	896.00
Abrishami, M.	1/29/20	Review memorandum re collecting collateral assets.	.20	128.00
Abrishami, M.	1/29/20	Confer with J. Hudson re research into illusory policies in New York.	.20	128.00
Abrishami, M.	1/29/20	Analyze "integrated occurrence" under certain policies.	.30	192.00
Lyle, R.	1/29/20	Confer with M. Abrishami re Purdue collateral policy amounts.	.10	30.50
Hudson, J.	1/30/20	Review protective order to understand impact on insurance review.	.10	67.50
Hudson, J.	1/30/20	Coordinate continued access to share site for insurance analysis.	.20	135.00
Hudson, J.	1/30/20	Direct research re potential application of certain policy language.	1.10	742.50
Hudson, J.	1/30/20	Review and outline next steps in insurance analysis.	.20	135.00
Jones, T.	1/30/20	Review policies across programs for arbitration and choice-of-law provisions.	6.00	1,740.00
Massarsky, B.	1/30/20	Confer with J. Hudson and Davis Polk re access to Purdue documents for coverage analysis.	.90	450.00
Massarsky, B.	1/30/20	Analyze notice provided to certain insurers re coverage determination.	.70	350.00
Johnson, K.	1/30/20	Research Purdue cases re batch notice.	1.20	270.00

Invoice Number: 11319228  
March 12, 2020

Name	Date	Services	Hours	Amount
Abrishami, M.	1/30/20	Analyze "integrated occurrence" under certain insurance policies.	1.10	704.00
Abrishami, M.	1/30/20	Confer with J. Hudson and C. Carey re researching New York law re certain policy provisions.	.40	256.00
Abrishami, M.	1/30/20	Confer with J. Hudson re batch notice.	.50	320.00
Abrishami, M.	1/30/20	Analyze 2001 batch notice.	5.40	3,456.00
Carey, C.	1/30/20	Meet with J. Hudson and M. Abrishami re research assignment.	.50	162.50
Carey, C.	1/30/20	Analyze certain policies for legal research purposes.	.30	97.50
Carey, C.	1/30/20	Communicate with J. Hudson and B. Massarsky re case law research re interpretation of coverage language under New York insurance law.	.20	65.00
Carey, C.	1/30/20	Review certain policies and case background information re underlying policy coverage provisions.	.50	162.50
Hudson, J.	1/31/20	Confer with D. Windscheffel, S. Hanson, and C. Matheson re analysis of bodily injury policies.	.50	337.50
Hudson, J.	1/31/20	Review analysis of choice-of-law and arbitration provisions.	.20	135.00
Hudson, J.	1/31/20	Review exclusionary language in preparation for discussion with UCC re coverage analysis.	.30	202.50
Hudson, J.	1/31/20	Review and outline next steps in insurance analysis.	.40	270.00
Jones, T.	1/31/20	Meet with J. Hudson re status of policy review.	.10	29.00
Jones, T.	1/31/20	Review policies across programs for arbitration and choice-of-law provisions.	7.70	2,233.00
<b>Project Total:</b>			<b>223.60</b>	<b>\$ 117,245.50</b>

**A003: Business Operations**

Name	Date	Services	Hours	Amount
Quinn, K.	1/06/20	Review bar date motion.	.40	380.00
Gilbert, S.	1/08/20	Confer with A. Preis re consultants.	.40	600.00
Quinn, K.	1/18/20	Review report of London meetings.	.20	190.00
Quinn, K.	1/21/20	Participate in call re IAC asset investigations with FTI and co-counsel	.80	760.00
Quinn, K.	1/21/20	Review UCC filing re bar date issues.	.20	190.00
Farra, A.	1/21/20	Telephone call with Houlihan, FTI, and others re due diligence update.	.70	399.00

Invoice Number: 11319228  
March 12, 2020

Name	Date	Services	Hours	Amount
Farra, A.	1/21/20	Analyze correspondence re due diligence and court hearing.	.30	171.00
Quinn, K.	1/22/20	Review draft filing re bar order.	.20	190.00
<b>Project Total:</b>			<b>3.20</b>	<b>\$ 2,880.00</b>

**A004: Case Administration**

Name	Date	Services	Hours	Amount
Gilbert, S.	1/03/20	Confer with R. Ringer re Ad Hoc Committee.	.30	450.00
Quinn, K.	1/06/20	Participate in call with outside counsel re coordination issues.	1.00	950.00
Bonesteel, A.	1/17/20	Research post bankruptcy insurance cases.	1.20	270.00
Johnson, K.	1/23/20	Research distribution list procedures re Purdue filings.	.50	112.50
Johnson, K.	1/23/20	Organize plans of liquidation and related materials.	.50	112.50
Johnson, K.	1/29/20	Update databases and calendar dates re incoming pleadings.	.40	90.00
Massarsky, B.	1/30/20	Review protective order.	.20	100.00
<b>Project Total:</b>			<b>4.10</b>	<b>\$ 2,085.00</b>

**A006: Employment / Fee Applications**

Name	Date	Services	Hours	Amount
Holland, P.	1/13/20	Finalize November fee statement; communicate with C. Gange re filing same.	.90	247.50
Holland, P.	1/16/20	Draft December 2019 fee statement; communicate with K. Quinn re same.	1.40	385.00
<b>Project Total:</b>			<b>2.30</b>	<b>\$ 632.50</b>

**A007: Emergency Relief Fund**

Name	Date	Services	Hours	Amount
Gilbert, S.	1/05/20	Confer with A. Preis re strategy issues and ERF.	.50	750.00
Gilbert, S.	1/06/20	Continue conversation with A. Preis re strategy issues and ERF.	.50	750.00
Quinn, K.	1/17/20	Confer with non-state group re comments to ERF draft.	.50	475.00
Gilbert, S.	1/21/20	Confer re emergency relief fund proposal, insurance motion and miscellaneous.	3.00	4,500.00

Invoice Number: 11319228  
March 12, 2020

Name	Date	Services	Hours	Amount
Quinn, K.	1/22/20	Participate in call with Debtors re emergency funding proposal.	.50	475.00
Quinn, K.	1/22/20	Review and consider UCC ERF proposal.	.30	285.00
Quinn, K.	1/23/20	Participate in call with Kramer Levin and Brown Rudnick re Debtors' initial response to ERF proposal.	.40	380.00
Farra, A.	1/24/20	Analyze emergency relief fund proposals.	1.00	570.00
Quinn, K.	1/26/20	Review R. Ringer draft correspondence to Debtors re ERF proposal.	.10	95.00
Quinn, K.	1/27/20	Confer with non-state group re ERF and case strategy.	1.00	950.00
Quinn, K.	1/29/20	Review correspondence re non-consenting state comments to ERF.	.30	285.00
<b>Project Total:</b>			<b>8.10</b>	<b>\$ 9,515.00</b>

**A008: Litigation: Contested Matters / Adversary Proceeding / Automatic Stay**

Name	Date	Services	Hours	Amount
Quinn, K.	1/02/20	Review TIG motion re automatic stay; communicate with team re same.	.50	475.00
Wolf, D.	1/02/20	Review TIG motion re automatic stay.	.20	120.00
Hudson, J.	1/03/20	Confer with S. Gilbert, K. Quinn, and D. Wolf re TIG's motion to lift stay as to pending arbitration.	.10	67.50
Hudson, J.	1/05/20	Confer with A. Kramer re insurers' motion to lift stay for arbitration.	.10	67.50
Hudson, J.	1/07/20	Review TIG motion to lift stay; confer with A. Kramer re same.	.50	337.50
Hudson, J.	1/09/20	Confer with A. Kramer re TIG's motion to lift the stay as to pending insurance arbitration.	.10	67.50
Hudson, J.	1/09/20	Analyze potential responses to TIG's motion to lift stay of arbitration.	.30	202.50
Hudson, J.	1/10/20	Confer with K. Benedict and M. Tobak re joining opposition to TIG's motion to lift the stay.	.30	202.50
Hudson, J.	1/13/20	Draft recommendation to Ad Hoc Committee re joinder to Debtors' opposition to TIG motion.	.40	270.00
Hudson, J.	1/13/20	Begin drafting joinder to opposition to TIG's motion for relief from bankruptcy stay.	.10	67.50
Hudson, J.	1/13/20	Communicate with team re joinder to Debtors' opposition to TIG motion.	.30	202.50
Hudson, J.	1/14/20	Confer with UCC re opposition to TIG motion.	.10	67.50

Invoice Number: 11319228  
March 12, 2020

Name	Date	Services	Hours	Amount
Quinn, K.	1/15/20	Communicate with Akin re insurer motion to arbitrate.	.20	190.00
Hudson, J.	1/15/20	Coordinate with Debtors' coverage counsel re objection to TIG's motion.	.10	67.50
Hudson, J.	1/15/20	Communicate with UCC re statements in support of Debtors' objection to TIG motion.	.20	135.00
Hudson, J.	1/15/20	Revise statement in support of Debtors' objection to TIG motion.	7.50	5,062.50
Johnson, K.	1/15/20	Organize cases and related materials re Debtors' objection to motion for relief from stay.	1.00	225.00
Quinn, K.	1/16/20	Review draft briefs in response to lift-stay motion.	.70	665.00
Quinn, K.	1/16/20	Communicate with co-counsel re motion to lift stay.	.10	95.00
Quinn, K.	1/16/20	Confer with J. Hudson and S. Gilbert re joinder in response to TIG motion.	.80	760.00
Hudson, J.	1/16/20	Revise statement in support of Debtors' objection to TIG motion.	11.20	7,560.00
Wolf, D.	1/16/20	Confer with J. Hudson, M. Rush, and B. Massarsky re TIG's motion to pursue arbitration.	.20	120.00
Massarsky, B.	1/16/20	Confer with J. Hudson re bankruptcy research on insurer lifting of stay.	.50	250.00
Massarsky, B.	1/16/20	Research re lifting bankruptcy stay to pursue arbitration over coverage issues.	4.20	2,100.00
Chalashtori, J.	1/16/20	Review historical materials and research for cases on trust litigation.	.50	190.00
Quinn, K.	1/17/20	Review and revise draft motion in opposition to motion to lift stay.	2.40	2,280.00
Quinn, K.	1/17/20	Confer with A. Troop re non-consenting states position re lift stay.	.20	190.00
Hudson, J.	1/17/20	Finalize statement in support of Debtors' objection to TIG motion.	3.70	2,497.50
Grim, E.	1/17/20	Research issues relating to trusts litigation of insurance.	.40	240.00
Grim, E.	1/17/20	Confer with B. Massarsky re issues relating to trusts litigation of insurance.	.30	180.00
Saunders, K.	1/17/20	Research cases for statement in support of Debtors' opposition to TIG's motion for relief from stay; cite check statement.	3.70	1,017.50
Massarsky, B.	1/17/20	Confer with E. Grim re research on post-bankruptcy trusts litigating re insurance assets.	.30	150.00
Massarsky, B.	1/17/20	Research examples of post-bankruptcy trusts litigation re insurance assets.	2.80	1,400.00

Invoice Number: 11319228  
March 12, 2020

Name	Date	Services	Hours	Amount
Johnson, K.	1/17/20	Fact check 2020.01.17 AHC statement in support of Debtors' opposition to TIG motion for relief from stay.	1.70	382.50
Chalashtori, J.	1/17/20	Review correspondence re research of insurance issues for inclusion in brief.	.20	76.00
Quinn, K.	1/21/20	Confer with D. Molton, S. Gilbert, and J. Hudson re argument on lift stay motion; follow up with S. Gilbert re same.	1.00	950.00
Hudson, J.	1/21/20	Prepare for hearing on TIG motion to lift stay.	.40	270.00
Quinn, K.	1/22/20	Review TIG reply brief and consider response.	1.70	1,615.00
Hudson, J.	1/22/20	Communicate with team re materials needed for hearing motion for relief.	.60	405.00
Johnson, K.	1/22/20	Revise materials for hearing re TIG motion to lift stay.	1.30	292.50
Quinn, K.	1/23/20	Participate in calls with UCC counsel and Debtors counsel in preparation for hearing.	1.10	1,045.00
Quinn, K.	1/23/20	Prepare for hearing re TIG motion to lift stay.	6.50	6,175.00
Hudson, J.	1/23/20	Confer with S. Brauner and K. Quinn re TIG motion to lift stay.	.30	202.50
Hudson, J.	1/23/20	Review materials in preparation for hearing on TIG motion to lift stay.	.90	607.50
Hudson, J.	1/23/20	Research instances in which claimants were permitted to intervene in analogous circumstances for hearing on TIG motion to lift the stay.	.40	270.00
Johnson, K.	1/23/20	Organize cases for hearing re TIG motion to lift stay.	3.50	787.50
Chalashtori, J.	1/23/20	Research re intervention of committee in coverage action.	1.70	646.00
Farra, A.	1/23/20	Research re TIG motion to lift automatic stay oral argument preparation.	1.10	627.00
Quinn, K.	1/24/20	Prepare for argument re TIG motion to lift stay, including meeting with Debtor and UCC counsel.	2.50	2,375.00
Quinn, K.	1/24/20	Attend hearing to argue TIG lift stay motion, including post-hearing meeting with Debtors.	6.00	5,700.00
Hudson, J.	1/24/20	Attend omnibus hearing (by phone) on TIG motion to lift stay.	1.00	675.00
Massarsky, B.	1/24/20	Confer with J. Hudson re TIG hearing results.	.20	100.00
Farra, A.	1/24/20	Attend hearing (via phone).	1.50	855.00
Hudson, J.	1/30/20	Review transcript of hearing on motion to lift stay.	.10	67.50
<b>Project Total:</b>			<b>77.70</b>	<b>\$ 51,646.50</b>



Invoice Number: 11319228  
March 12, 2020

**A009: Meetings / Communications with AHC & Creditors**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Gilbert, S.	1/06/20	Confer with Ad Hoc Committee professionals re status.	1.00	1,500.00
Quinn, K.	1/07/20	Review communications with R. Ringer re Committee meetings.	.20	190.00
Quinn, K.	1/07/20	Participate in non-states call re update.	.90	855.00
Farra, A.	1/07/20	Telephone call with non-state Ad Hoc Committee members re emergency fund.	.90	513.00
Quinn, K.	1/09/20	Participate in weekly status and strategy meeting with client.	1.00	950.00
Farra, A.	1/09/20	Telephone call with AHC re status and strategy; draft notes re same.	1.10	627.00
Gilbert, S.	1/10/20	Confer with A. Preis re status; confer with Ad Hoc Committee professionals.	1.50	2,250.00
Farra, A.	1/10/20	Correspond with Ad Hoc Committee professionals re status.	.50	285.00
Gilbert, S.	1/13/20	Confer with Ad Hoc Committee professionals re status.	1.00	1,500.00
Gilbert, S.	1/17/20	Confer with Ad Hoc Committee professionals re strategy.	2.70	4,050.00
Farra, A.	1/21/20	Telephone call with Brown Rudnick, non-state Ad Hoc Committee members re status update.	.70	399.00
Farra, A.	1/21/20	Telephone call with AHC re status update.	1.10	627.00
Gilbert, S.	1/22/20	Attend Ad Hoc Committee meeting re open issues and strategy.	1.30	1,950.00
Quinn, K.	1/22/20	Participate in call with client re status of open matters and strategy.	1.30	1,235.00
Gilbert, S.	1/23/20	Confer with AG reps re coordination; confer with Ad Hoc Committee professionals re strategy.	2.00	3,000.00
Farra, A.	1/23/20	Telephone call with Ad Hoc Committee professionals re emergency relief proposal; prepare re same.	.50	285.00
Farra, A.	1/27/20	Telephone call with Brown Rudnick, non-state Ad Hoc Committee members re status update.	1.20	684.00
Gilbert, S.	1/28/20	Confer with Ad Hoc Committee counsel re status update.	1.20	1,800.00
Farra, A.	1/29/20	Telephone call with AHC re update.	1.00	570.00
Gilbert, S.	1/31/20	Confer with Ad Hoc Committee re process of bankruptcy.	4.00	6,000.00
Quinn, K.	1/31/20	Confer with AHC re bankruptcy process.	4.00	3,800.00
<b>Project Total:</b>			<b>29.10</b>	<b>\$ 33,070.00</b>

Invoice Number: 11319228  
March 12, 2020

**A015: Non-Working Travel Time (Billed @ 50%)**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Gilbert, S.	1/14/20	Travel to New York, NY for meeting re Sacklers.	5.00	3,750.00
Gilbert, S.	1/15/20	Travel from New York, NY to Miami, FL	6.00	4,500.00
Quinn, K.	1/15/20	Travel to / from New York, NY for meeting with Sackler representatives re assets.	8.00	3,800.00
Quinn, K.	1/23/20	Travel to New York for hearing.	3.50	1,662.50
Quinn, K.	1/24/20	Travel to Washington, DC after hearing.	4.00	1,900.00
<b>Project Total:</b>			<b>26.50</b>	<b>\$ 15,612.50</b>

**A019: Plan of Reorganization / Disclosure Statement**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Gilbert, S.	1/08/20	Attend Mundipharma meeting.	2.00	3,000.00
Quinn, K.	1/08/20	Participate by telephone in Mundipharma presentation.	2.00	1,900.00
Quinn, K.	1/13/20	Review Houlihan report.	.10	95.00
Gilbert, S.	1/14/20	Confer with D. Nachman re coordination with non-consenting states.	1.00	1,500.00
Gilbert, S.	1/14/20	Meet with S. Birnbaum re issues.	2.00	3,000.00
Gilbert, S.	1/15/20	Meet with creditor constituencies re plan strategy.	2.00	3,000.00
Quinn, K.	1/15/20	Meet with creditor constituencies re plan strategy.	2.00	1,900.00
<b>Project Total:</b>			<b>11.10</b>	<b>\$ 14,395.00</b>

**TOTAL CHARGEABLE HOURS 385.70**

**TOTAL FEES \$ 247,082.00**

Invoice Number: 11319228  
March 12, 2020

#### TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Gilbert, S.	11.00	750.00	8,250.00
Gilbert, S.	35.10	1,500.00	52,650.00
Quinn, K.	15.50	475.00	7,362.50
Quinn, K.	45.30	950.00	43,035.00
Litherland, C.	.40	1,250.00	500.00
Holland, P.	2.30	275.00	632.50
Hudson, J.	51.80	675.00	34,965.00
Grim, E.	1.10	600.00	660.00
Wolf, D.	3.40	600.00	2,040.00
Jones, T.	66.90	290.00	19,401.00
Saunders, K.	3.70	275.00	1,017.50
Rush, M.	24.50	640.00	15,680.00
Massarsky, B.	36.00	500.00	18,000.00
Johnson, K.	11.50	225.00	2,587.50
Abrishami, M.	39.60	640.00	25,344.00
Bonesteel, A.	1.20	225.00	270.00
Lyle, R.	18.10	305.00	5,520.50
Chalashtori, J.	2.40	380.00	912.00
Farra, A.	12.60	570.00	7,182.00
Carey, C.	3.30	325.00	1,072.50
<b>TOTALS</b>	<b>385.70</b>		<b>\$ 247,082.00</b>

#### TASK SUMMARY

Task	Description	Hours	Amount
A001	Asset Analysis & Recovery	223.60	117,245.50
A003	Business Operations	3.20	2,880.00
A004	Case Administration	4.10	2,085.00
A006	Employment / Fee Applications	2.30	632.50
A007	Emergency Relief Fund	8.10	9,515.00
A008	Litigation: Contested Matters / Adversary Proceedings / Automatic Stay	77.70	51,646.50
A009	Meetings / Communications with AHC & Creditors	29.10	33,070.00
A015	Non-Working Travel Time (Billed @ 50%)	26.50	15,612.50
A019	Plan of Reorganization / Disclosure Statement	11.10	14,395.00

Invoice Number: 11319228  
March 12, 2020

## EXPENSE DETAILS

### E106: Online Research

Date	Description	Task	Amount
1/13/20	Lexis	E106	173.47
1/23/20	Lexis	E106	38.02
1/31/20	Westlaw	E106	1,880.94
1/31/20	PACER	E106	105.00
<b>Sub-Total of Expenses:</b>			<b>\$ 2,197.43</b>

### E110: Out-of-Town Travel

Date	Description	Task	Amount
1/15/20	Travel - Train Fare - Kami Quinn / New York, NY / Attend and Participate in Sackler Presentation / 01/15/2020 (Coach Fare)	E110	630.00
1/15/20	Travel - Taxi Fare - Kami Quinn / New York, NY / Attend and Participate in Sackler Presentation / 01/15/2020	E110	40.49
1/24/20	Travel - Airfare - Kami Quinn / New York NY / Attend Omnibus Hearing / 01/23-24/2020 (Coach Fare)	E110	776.81
1/24/20	Travel - Lodging - Kami Quinn / New York NY / Attend Omnibus Hearing / 01/23-24/2020	E110	368.29
1/24/20	Travel - Taxi Fare - Kami Quinn / New York NY / Attend Omnibus Hearing / 01/23-24/2020	E110	58.28
1/24/20	Travel - Meals - Kami Quinn / New York NY / Attend Omnibus Hearing / 01/23-24/2020	E110	42.81
<b>Sub-Total of Expenses:</b>			<b>\$ 1,916.68</b>

### E118: Litigation Support Vendors

Date	Description	Task	Amount
12/31/19	Contracted Professional Fees - Aldebaran Group - Case Support - 12.01.2019 - 12.31.2019	E118	682.11
<b>Sub-Total of Expenses:</b>			<b>\$ 682.11</b>

**TOTAL EXPENSES** **\$ 4,796.22**

Invoice Number: 11319228  
March 12, 2020

**EXPENSE SUMMARY**

<b>Description</b>	<b>Amount</b>
Travel - Airfare	776.81
Travel - Train Fare	630.00
Travel - Lodging	368.29
Travel - Taxi Fare	98.77
Travel - Meals	42.81
Contracted Professional Fees	682.11
Lexis	211.49
Westlaw	1,880.94
PACER	105.00
<b>TOTAL FEES AND EXPENSES</b>	<b>\$ 251,878.22</b>